

CALFRESH REQUEST FOR POLICY INTERPRETATION**PI# 17-94**

INSTRUCTIONS: Complete items 1 - 10 on the form. Use a separate form for each policy interpretation request. If additional space is needed, please use the second page. Retain a copy for your records and submit via email to CalFresh-PI@dss.ca.gov.

Please note: the policy interpretation provided is based on the unique set of facts presented and should not be assumed to apply in all scenarios.

1. RESPONSE NEEDED DUE TO: <input checked="" type="checkbox"/> Policy/Regulation Interpretation <input type="checkbox"/> QC <input type="checkbox"/> Other:		5. DATE OF REQUEST: 12/06/2017	NEED RESPONSE BY:
2. REQUESTOR NAME:		6. COUNTY/ORGANIZATION: El Dorado County	
3. PHONE NO.:	EMAIL:	7. SUBJECT: Applicant IEVS Asset Income	
4. REGULATION CITE(S): 63-300.5(m)(3), 20-006.542, 20-006.543(b)(1)		8. REFERENCES: <i>(Include ACL/ACIN, court cases, etc. in references)</i> NOTE: All requests must have a regulation cite(s) and/or a reference(s).	

9. QUESTION: (INCLUDE SCENARIO IF NEEDED FOR CLARITY):

If an Applicant IEVS is received and the report shows asset income that was not reported by the client, is it required to verify the asset income and count it in the CF budget no matter the amount?

A) Applicant applies 11/1/2017 for CF. Client states he has zero income. Case is granted, applicant IEVS populates showing \$25 asset income for 2015. Client did not mention this income, either because it was two years ago and the account is now closed or because he forgot. \$25 over the span of one year would have no impact to benefits. Do we verify this asset income to see if it still exists in current year?

B) Applicant applies 11/1/2017 for CF. Client verifies 900/mo gross earnings. Case is granted, applicant IEVS populates showing \$5000 asset income for 2015. Client did not mention this income, either because it was two years ago and the account is now closed or because he forgot. \$5000 over one year would have an impact to benefits. Do we verify this asset income to see if it still exists in current year?

10. REQUESTOR'S PROPOSED ANSWER:

Asset income on an Applicant IEVS does not represent current income, as asset matches are typically 1-2 years prior to current year. It is entirely possible client still has the asset that generates income; for CalFresh applications, assets (property) are exempt, thus we would not necessarily know about them until the Applicant IEVS populates. If client did not claim asset income (dividends and/or interest), and asset income appears on the Applicant IEVS, AND there is no other documentation on the asset income, then yes, the county will need to seek verification of either the asset income or that the asset no longer exists to produce the income.

A) Asset income would have zero impact to benefits. Yes, we need to verify; if client reports earnings from a new job, asset income could potentially impact benefits at that point.

B) Asset income would have an impact to benefits. Yes, we need to verify this asset income to see if it still exists and apply it to the case appropriately (in this case, there may be OIs from date of application as client failed to disclose).

11. STATE POLICY RESPONSE (CFPB USE ONLY):

A) In the scenario provided above, the CWD would need to verify the asset income that populated in applicant IEVS to confirm if the asset income still exists in the current year and to also verify if the current amount would impact their CalFresh budget when it was awarded to them at approval. The CWD shall verify the information by sending the client an RFC. If the client doesn't respond they will be discontinued per MPP§20-006.543(b)(1) and 7 CFR §273.2(f)(9)(v)

B) In the scenario provided above, the CWD would need to verify the asset income that populated in applicant IEVS to confirm if the asset income still exists in the current year and to also verify if the amount would impact their CalFresh budget when it was awarded to them at approval. Considering the amount stated above, and if confirmed current, there may be an overissuance from the date of application. The CWD shall verify the information by sending the client an RFC. If the client doesn't respond they will be discontinued per MPP§20-006.543(b)(1) and 7 CFR §273.2(f)(9)(v).

FOR CDSS USE

DATE RECEIVED:	DATE RESPONDED TO COUNTY/ALJ: 02/01/2018 AB
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